

STATE OF INDIANA

FILED

INDIANA UTILITY REGULATORY COMMISSION

JUN 14 2000

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE COMMISSION'S )  
GENERIC INVESTIGATION OF INCUMBENT )  
LOCAL EXCHANGE CARRIER'S PROVISION ) CAUSE NO. 41324  
OF OPERATING SUPPORT SYSTEMS ("OSS") )

and

IN THE MATTER OF THE PETITION OF )  
INDIANA BELL TELEPHONE COMPANY, )  
INCORPORATED D/B/A AMERITECH INDIANA ) CAUSE NO. 41657  
PURSUANT TO LC. 8-1-2-61 FOR A THREE )  
PHASE PROCESS FOR COMMISSION )  
PREVIEW OF VARIOUS SUBMISSION OF )  
AMERITECH INDIANA TO SHOW )  
COMPLIANCE WITH SECTION 271(C) OF THE )  
TELECOMMUNICATIONS ACT OF 1996 )

GTE North Incorporated and Contel of the South, Inc.  
Reply Responses to Questions  
in the Commission's May 26, 2000 Docket Entry

Q1. Should the Commission transfer to this docket [41657] consideration of the Ameritech Indiana baseline OSS performance measures which are being developed in Phase 2 of Cause No. 41324?

A1. GTE supports various parties response comments that the Commission simply defer proceedings in Cause No. 41324 at this time. As evidenced in the various parties' comments, many efficiencies could be gained by reviewing Ameritech 's OSS performance measures in a regional collaborative effort.

GTE however, disagrees with the Indiana Office of the Consumer Counselor's ("OUCC") response or recommendation that the results of the Ameritech regional collaborative effort

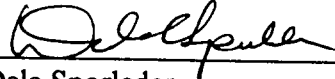
could be used as the basis for GTE and Sprint OSS performance standards. As stated many times through out this investigation, OSS performance standards are developed to monitor and measure the ILEC's operating interface systems to demonstrate nondiscriminatory access to OSS in compliance with TA96. Since the ILECs have different operating systems, procedures and business rules, the OSS performance standards must be different. The OUCC's attempt to change or require the change of every ILECs operating system to allow for standard OSS reporting seems unnecessary with current reporting mechanisms, extremely expensive to implement and terribly burdensome to the ILCE. Furthermore, several CLECs have represented to GTE that they would rather have one set of OSS standards for all GTE operating territories rather than state-specific. Thus, CLECs that deal with GTE know and want to interface with one set of standards, not different performance standards for each of the 26 states served by GTE. Thus, any approval of a single set of state performance measures would not be the public interest.

**Q4. If the Commission transfers consideration of the OSS performance measures form Cause No 41324 to this docket, would it be possible for the Commission to consider OSS cost-recovery for Ameritech Indiana in Phase 3 of Cause No. 41324?**

**A4.** Most of the commenting parties suggest that OSS cost recovery is most appropriately addressed in the ongoing unbundled network element (UNE) proceedings of the individual companies. GTE supports this position and has included OSS cost in the company's compliance filing in Cause No. 40618 which is pending Commission final approval. However, if there are significant changes required to the OSS systems that result in the Phase 2 portion

of this proceeding, it would be appropriate for any ILEC to seek changes to the OSS cost recovery either in Phase 3 of this proceeding or a subsequent filing in their respective UNE proceeding.

Respectfully submitted, this 14<sup>th</sup> day of June, 2000.



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### CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing GTE's Response has been served upon the following counsel of record in the captioned proceeding by depositing a copy of same in the United States mail, first class postage prepaid, on this 14<sup>th</sup> day of June, 2000.

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